

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT  
CIVIL DIVISION**

JUAN SALAZAR; et al.,

**Plaintiffs,**

**v.**

CENTURY ARMS, INC., and ROMARM,  
S.A.,

**Defendants.**

C.A. No. 2:22-cv-146

**STIPULATED MOTION TO EXTEND DISCOVERY-RELATED DEADLINES**

Plaintiffs, with the prior consent of Defendant Century Arms, Inc. by and through counsel, respectfully ask this honorable Court to extend all discovery-related deadlines otherwise imposed under the Vermont Local Rules and/or the Federal Rules of Civil Procedure by an additional 90 days following entry of an Order granting this motion. This stipulated motion is not intended to shorten or limit any deadline. Reference is made to separate but related case captioned *Wendy Towner et al v. Century Arms, Inc. et al.*, C.A. No. 2:22-cv-145 – which shares common claims and Defendants with this matter. In that related case, but not this one, Century filed a Motion to Reconsider [ECF No. 31] the Court’s Opinion and Order on Motion to Dismiss. Discovery efforts and expenses in these two matters will be significant, and should be combined for the efficiency of all parties. An extension of deadlines would allow discovery in the two matters to proceed together.

Plaintiffs appreciate the Court’s review of this matter.

Dated: March 26, 2025

s/ Philip Bangle  
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